

## BEFORE THE TENNESSEE REGULATORY ANTHORY IN 11 59

AI NASHVILLE, IENNE	SSEE	EXECUTIVE SECRETARY
IN RE:	)	
	)	
PETITION OF UNITED TELEPHONE	)	
COMPANY TO CHANGE AND INCREASE	)	
CERTAIN INTRASTATE RATES AND	)	<b>DOCKET NO. 01-00451</b>
CHARGES SO AS TO PERMIT IT TO EARN	)	
A FAIR AND ADEQUATE RATE OF RETURN	)	
ON ITS PROPERTY USED AND USEFUL IN	)	
FURNISHING TELEPHONE SERVICE TO ITS	)	
CUSTOMERS IN TENNESSEE AND TO ADOPT	<u>)</u>	
NEW AND REALISTIC DEPRECIATION RATES	)	
FOR CENTRAL OFFICE EQUIPMENT	<u> </u>	

## **AGREED MOTION**

The United Telephone Company ("United"), the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), and the Staff of the Tennessee Regulatory Authority ("TRA Staff", as a party) respectfully move that the Pre-Hearing Officer modify the procedural schedule set forth in the July 16, 2001 *Notice of the Procedural Schedule* as follows:

September 12, 2001	Amendment to Petition
September 17, 2001	Discovery Requests
September 24, 2001	Discovery Responses
October 3, 2001	Direct Testimony (Intervenors)
October 12, 2001	Rebuttal Testimony (all parties)

Such modification and additional time is requested to permit United to amend its Petition and allow the parties time to address such amendment through new discovery and testimony. Such discovery shall be limited to any new issues raised because of the amendment to the Petition and/or any subsequent testimony filed by United.

The parties further agree that any statutory deadlines associated with the filing of United's Petition are extended for a duration equivalent to the length of such modification to the procedural schedule.

Respectfully submitted,

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